

REMARKS/ARGUMENTS

Claims 1 - 32 are pending in the subject patent application. Claims 1, 11, 19, and 27 have been amended. Support for the amendments is found in the specification, drawings, and claims as originally filed. Applicant respectfully submits, therefore, that the amendments do not add new matter.

35 U.S.C. § 103 Claim Rejections

Claims 1 – 19, and 22 - 31 are rejected as allegedly being unpatentable over U.S. Patent 6,782,245 to Lazzarotto et al. (“Lazzarotto”) in view of U.S. Patent 7,092,375 to Pitsoulakis (“Pitsoulakis”).

Applicant respectfully submits that the present claims as claimed, for example, in claim 1 as amended are not rendered obvious by Lazzarotto in view of Pitsoulakis. Claim 1, as amended, includes the following limitations.

A core wireless engine design comprising:

a transceiver
a microprocessor; and

a standardized interface arrangement, the standardized interface arrangement adapted to be interconnected to a variety of types of host interfaces implementing a plurality of bus standards, each host interface designed to interface with the standardized interface arrangement.

(Claim 1, as amended) (Emphasis added)

The Examiner has stated that Lazzarotto does not disclose a standardized interface arrangement that is adapted to be interconnected to a variety of types of host interfaces that implement a plurality of bus standards.

The Examiner has stated that this limitation is found in Pitsoulakis at Figure 9 and the corresponding text and that a combination of Lazzarotto and Pitsoulakis renders the claimed invention obvious. However, neither Pitsoulakis nor Lazzarotto disclose a standardized interface arrangement within the context of the claimed invention and neither reference provides any suggestion of combination.

Applicant maintains the position that Lazzarotto only discloses multiple ports for interfacing wireless peripherals. In Lazzarotto, interconnection to multiple wireless peripherals is effected using multiple ports. Lazzarotto does not disclose a “standardized” interface. Lazzarotto does refer to an interface (e.g., interface 100) as having two ports. However, a closer reading of Lazzarotto clearly distinguishes Lazzarotto from the invention as claimed. The “interface” of Lazzarotto cannot be equated with the “interface arrangement” as claimed because the interface of Lazzarotto includes the antenna, the processor, and the front-end circuitry (e.g., RF front-end circuitry) as well as the ports for interfacing to the wireless peripheral devices. Moreover, applicants has previously amended the claims to make the distinction clear that the standardized interface is adapted to be interconnected to a variety of types of host interfaces implementing a plurality of bus standards and Lazzarotto does not disclose or suggest this limitation. Therefore, there is no basis for a combination with Pitsoulakis. Neither reference contains any suggestion or motivation for their combination. Lazzarotto has no mention of multiple bus standards and Pitsoulakis does not contemplate a standardized interface arrangement.

Applicant has further amended the claims to clearly distinguish between the invention as claimed and the result of a combination of Lazzarotto and Pitsoulakis. As amended, claim 1 includes the limitation that each host interface is designed to interface with the standardized interface arrangement. Such limitation cannot be found in either Lazzarotto or Pitsoulakis, alone or in combination.

Applicant is confident that the additional limitation clarifies the distinction between the invention as claimed and Lazzarotto, Pitsoulakis, or any proposed combination thereof.

For these reasons applicant respectfully submits that claim 1 is not anticipated nor rendered obvious by Lazzarotto or Pitsoulakis, alone or in combination. Given that claims 2 – 10 depend, directly or indirectly, from claim 1, applicant respectfully submits that claims 2 - 10, are, likewise, not anticipated nor rendered obvious by Lazzarotto or Pitsoulakis, alone or in combination.

Further, given that claims 11, 19, and 27 include the limitations as discussed above, applicant respectfully submits that claims 11, 19, and 27 are likewise not anticipated nor rendered obvious by Lazzarotto or Pitsoulakis, alone or in combination. Given that claims 12 – 18, claims 20 – 26, and claims 28 - 32, directly or indirectly, from claims 11, 19, and 27, respectfully, applicant respectfully submits that claims 12 – 18, 20 – 26, and 28 - 32, are, likewise, not anticipated nor rendered obvious by Lazzarotto or Pitsoulakis, alone or in combination.

Applicant maintains that in regard to claim 2, Lazzarotto only discloses that functionality disclosed may be incorporated into a hub of varying form factor. Lazzarotto as cited by the Examiner discloses the following.

Generally, the antenna 830 receives one or more communication signals transmitted from the antenna of a transmitter. The receiver 805 is included in a communication front-end to separate the one or more communication signals based on frequency of that signal so that it can be associated with a particular device. Further, the receiver 805 converts the communication signal into a digital data signal. The MCU 815 receives the digital data signal and processes it. More particularly, the MCU 815 decodes the digital data signal, determines if that data signal is valid (e.g., no errors) and from a wireless peripheral within its communication system, converts the data signal into a USB format, and transmits that data signal for the USB port of a host. The host may be any USB enable device. The host interface 825 includes the appropriate connections for coupling with the host.

The disclosure provides a few embodiments for creating, designing, and manufacturing a communication hub including a USB wireless peripheral interface (e.g., 300a, 300b, 400, 500a, 500b, 600a, 600b) in accordance with the present invention. The functionality disclosed may be incorporated into a communication hub of varying form factors. For example, in one embodiment the communication hub may have a form factor of defined by a standards organization such as the Personal Computer Memory Card International Association (PCMCIA) specification or Compact Flash (CF).TM. Association specification. In another embodiment, the communication hub may have a custom form factor of, for example, approximately 10 centimeters by 6 centimeters by 2 centimeters.

(Lazzarotto, column 13, lines 16 -45) (Emphasis added)

A thorough reading of this section of Lazzarotto makes clear that Lazzarotto is referring to alternative embodiments. That is, Lazzarotto discloses only that different embodiments of the invention may be implemented with different form factors. (See Lazzarotto, column 13, lines 35 -45). The Examiner is requested to reread this section Lazzarotto and note the use of the disjunctive “or” in reference to the proffered alternative embodiments.

In contrast claim 2, provides a core wireless engine designed to fit in a variety of form factor units. This limitation is not disclosed or suggested by Lazzarotto.

For these reasons applicant respectfully submits that claims 2, 3, and 11 – 32 are further distinguished from, and not anticipated nor rendered obvious by Lazzarotto or Pitsoulakis, alone or in combination.

Applicant respectfully submits that neither U.S. Patent 6,539,438 to Ledzias et al., nor US Patent Application 2002/0176223 to Shiozaki remedy the defects of Lazzarotto, Pitsoulakis, or any proposed combination thereof in regard to the distinguishing limitations as discussed above. None of the cited references, alone or in combination, disclose or suggest the limitation of a standardized interface arrangement that is adapted

to be interconnected to a variety of types of host interfaces with each host interface designed to interface with the standardized interface arrangement.

CONCLUSION

In view of the foregoing, Applicant believes all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 408-282-1809.

Please charge any additional required fee or credit any overpayment not otherwise paid or credited to our deposit account No. 50-1698.

Respectfully submitted,

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